

From: Maria VanDusen [mailto:mariavandusen@gmail.com]
Sent: Friday, April 06, 2012 3:15 PM
To: Baskin, Kathleen (EEA)
Subject: SWMI proposal comments

77 Main Street

Boxford, MA 01921

April 6, 2012

Kathleen Baskin, P.E.

Director of Water Policy and Planning

Executive Office of Environmental Affairs

100 Cambridge Street

Boston, MA

Dear Ms. Baskin,

Given all the effort that the state agency staff and numerous other organizations and individuals have dedicated to the SWMI process, I am dismayed at several aspects of the proposed SWMI framework. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward but the serious weaknesses in the proposed SWMI Framework create a management system that is unsustainable for the future of our water resources.

I strongly urge EEA to make to make the safe yield methodology really safe for our rivers. We all know that if this proposed safe yield methodology were used, many of our rivers would be pumped dry as they have been in the past. At this time, now that we understand better than ever what is needed to maintain ecologically healthy rivers, we ask that adequate flows be maintained in rivers throughout the year. If EEA can not determine a credible safe yield methodology, I suggest that the task be assigned to the USGS. We must have a “hands off flow” that must stay in the rivers to maintain the ecosystem. What you propose does not do that.

It is time for crucial steps forward to protect our rivers and our water supplies. These are complementary not antagonistic goals; one helps the other. Please reconsider the unsustainable parts of this proposal as spelled out in more detail by organizations and wise people who have given you the details and the benefits of their study and analysis. Make this an inclusive joint effort that we can all support and then get on with a viable permitting process.

Thanks you for your time in addressing these concerns while there is still time to establish a good methodology.

Sincerely,

Maria Van Dusen

formerly Director of the Massachusetts Riverways Programs

cc: Conservation Law Foundation

Ipswich River Watershed Association

Massachusetts Rivers Alliance